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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAMUEL BERNARD JOHNSON, III,

Plaintiff,

V.

CHEVRON CORPORATION and CHEVRON
ENVIRONMENTAL MANAGEMENT
COMPANY,

Defendants.

Case No. C 07-05756 WHA

**DEFENDANTS CHEVRON
CORPORATION'S AND CHEVRON
ENVIRONMENTAL MANAGEMENT
COMPANY'S ANSWER TO PLAINTIFF'S
COMPLAINT**

DEMAND FOR JURY TRIAL

Defendants Chevron Corporation and Chevron Environmental Management Company (collectively “Chevron”) (all other previously named defendants having been voluntarily dismissed by Plaintiff and by Order of the Court on April 1, 2008) in answer to Plaintiff Samuel Bernard Johnson III’s (“Plaintiff”) November 14, 2007 Complaint (“Complaint”), hereby deny, admit, and allege as follows:

As a preliminary matter, Chevron **objects** to the form and content of Plaintiff's Complaint, comprised of 219 separate paragraphs and superfluous, irrelevant and inflammatory contentions, on the grounds that the Complaint fails to comply with Federal Rules of Civil Procedure, Rule 8(a) which requires a "**short and plain** statement" of Plaintiff's claims. (Emphasis added.)

1. In response to pages 1:26-4:2 of the Complaint, Chevron alleges that the procedural statements are immaterial, and as such, require no response. In addition, and specifically as to Plaintiff's reference to 42 U.S.C. section 1983, such allegations are irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008.

2. In response to paragraph 1 of the Complaint, Chevron admits the allegations on information or belief.

3. In response to paragraph 2 of the Complaint, Chevron admits the allegations on information or belief.

4. In response to paragraph 3 of the Complaint, Chevron asserts that the allegations are immaterial as Plaintiff voluntarily dismissed Chevron Corporation Long-Term Disability Organization Plan from this action on April 1, 2008. As such, the allegation requires no response.

5. In response to paragraph 4 of the Complaint, Chevron admits the allegations on information or belief.

6. In response to paragraph 5 of the Complaint, Chevron alleges that the procedural statement is immaterial, and as such, requires no response.

7. In response to paragraph 6 of the Complaint, Chevron asserts that the allegations are immaterial as Plaintiff voluntarily dismissed Catherine Drew from this action on April 1, 2008. As such, the allegations require no response.

8. In response to paragraph 7 of the Complaint, Chevron asserts that the allegations are immaterial as Plaintiff voluntarily dismissed Kathryn Gallacher from this action on April 1, 2008. As such, the allegation requires no response.

9. In response to paragraph 8 of the Complaint, Chevron asserts that the allegations are immaterial as Plaintiff voluntarily dismissed Susan Solger from this action on April 1, 2008. As

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1 such, the allegation requires no response.

2 10. In response to paragraph 9 of the Complaint, Chevron asserts that the allegations are
3 immaterial as Plaintiff voluntarily dismissed Sellers Stough from this action on April 1, 2008. As
4 such, the allegation requires no response.

5 11. In response to paragraph 10 of the Complaint, Chevron asserts that the allegations
6 are immaterial as Plaintiff voluntarily dismissed Krystal Tran from this action on April 1, 2008. As
7 such, the allegation requires no response.

8 12. In response to paragraph 11 of the Complaint, Chevron asserts that the allegations
9 are immaterial as Plaintiff voluntarily dismissed Debbie Wong from this action on April 1, 2008.
10 As such, the allegation requires no response.

11 13. In response to paragraph 12 of the Complaint, Chevron asserts that the allegations
12 are immaterial as Plaintiff voluntarily dismissed Gary Yamashita from this action on April 1, 2008.
13 As such, the allegation requires no response.

14 14. In response to paragraph 13 of the Complaint, Chevron alleges that the procedural
15 statement is immaterial, and as such, requires no response. Chevron also asserts that the allegations
16 are immaterial as Plaintiff voluntarily dismissed all of the "Individual Defendants" on April 1,
17 2008. As such, the allegation requires no response.

18 15. In response to paragraph 14 of the Complaint, on information and belief Chevron
19 denies that Plaintiff is unaware of the true names and capacities of Does 1 through 10. In response
20 to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief
21 about the truth of the allegations in this paragraph and basing its response on this ground, denies
22 each and every allegation.

23 16. In response to paragraph 15 of the Complaint, Chevron lacks information or belief
24 sufficient to admit or deny the allegations concerning the relationships between, and status of, each
25 Defendant and basing its denial on this ground, denies each and every allegation. On information
26 and belief, Chevron denies the remaining allegations of this paragraph, including all allegations
27 regarding each Defendant's purported actions, inactions, omissions, and Plaintiff's supposed

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1 injuries.

2 17. In response to paragraph 16 of the Complaint, on information and belief Chevron
3 admits that allegations regarding the date on which Plaintiff began his employment, the date on
4 which he was terminated, and that he was employed in the position of Procurement Specialist. As
5 to all remaining allegations in this paragraph, Chevron denies the allegations on information or
6 belief.

7 18. In response to paragraph 17 of the Complaint, Chevron denies the allegations on
8 information or belief.

9 19. In response to paragraph 18 of the Complaint, Chevron denies the allegations on
10 information or belief.

11 20. In response to paragraph 19 of the Complaint, Chevron lacks sufficient knowledge
12 or information to form a belief about the truth of the allegations in this paragraph and basing its
13 response on this ground, denies each and every allegation.

14 21. In response to paragraph 20 of the Complaint, Chevron lacks sufficient knowledge
15 or information to form a belief about the truth of the allegations in this paragraph and basing its
16 response on this ground, denies each and every allegation.

17 22. In response to paragraph 21 of the Complaint, Chevron lacks sufficient knowledge
18 or information to form a belief about the truth of the allegations in this paragraph and basing its
19 response on this ground, denies each and every allegation.

20 23. In response to paragraph 22 of the Complaint, Chevron lacks sufficient knowledge
21 or information to form a belief about the truth of the allegations in this paragraph and basing its
22 response on this ground, denies each and every allegation.

23 24. In response to paragraph 23 of the Complaint, Chevron lacks sufficient knowledge
24 or information to form a belief about the truth of the allegations in this paragraph and basing its
25 response on this ground, denies each and every allegation.

26 25. In response to paragraph 24 of the Complaint, Chevron lacks sufficient knowledge
27 or information to form a belief about the truth of the allegations in this paragraph and basing its

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1 response on this ground, denies each and every allegation.

2 26. In response to paragraph 25 of the Complaint, Chevron lacks sufficient knowledge
3 or information to form a belief about the truth of the allegations in this paragraph and basing its
4 response on this ground, denies each and every allegation.

5 27. In response to paragraph 26 of the Complaint, on information or belief Chevron
6 denies that Plaintiff was subjected to any discriminatory employment practices. As to the
7 remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about
8 the truth of the allegations in this paragraph and basing its response on this ground, denies each and
9 every remaining allegation.

10 28. In response to paragraph 27 of the Complaint, Chevron lacks sufficient knowledge
11 or information to form a belief about the truth of the allegations in this paragraph and basing its
12 response on this ground, denies each and every allegation.

13 29. In response to paragraph 28 of the Complaint, on information or belief Chevron
14 denies that Plaintiff was subjected to any discriminatory or retaliatory employment practices. As to
15 the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief
16 about the truth of the allegations in this paragraph and basing its response on this ground, denies
17 each and every remaining allegation.

18 30. In response to paragraph 29 of the Complaint, Chevron lacks sufficient knowledge
19 or information to form a belief about the truth of the allegations in this paragraph and basing its
20 response on this ground, denies each and every allegation.

21 31. In response to paragraph 30 of the Complaint, on information or belief Chevron
22 denies that any discriminatory employment practices occurred. As to the remaining allegations,
23 Chevron lacks sufficient knowledge or information to form a belief about the truth of the
24 allegations in this paragraph and basing its response on this ground, denies each and every
25 remaining allegation.

26 32. In response to paragraph 31 of the Complaint, on information or belief Chevron
27 denies that any discriminatory employment practices occurred. As to the remaining allegations,

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1 Chevron lacks sufficient knowledge or information to form a belief about the truth of the
2 allegations in this paragraph and basing its response on this ground, denies each and every
3 remaining allegation.

4 33. In response to paragraph 32 of the Complaint, Chevron lacks sufficient knowledge
5 or information to form a belief about the truth of the allegations in this paragraph and basing its
6 response on this ground, denies each and every allegation.

7 34. In response to paragraph 33 of the Complaint, on information or belief Chevron
8 denies that Plaintiff was subjected to any discriminatory or retaliatory employment practices. As to
9 the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief
10 about the truth of the allegations in this paragraph and basing its response on this ground, denies
11 each and every remaining allegation.

12 35. In response to paragraph 34 of the Complaint, Chevron denies the allegations on
13 information or belief.

14 36. In response to paragraph 35 of the Complaint, on information or belief Chevron
15 denies that Plaintiff was subjected to any discrimination, retaliation, harassment, discriminatory or
16 retaliatory employment practices, or emotional distress. As to the remaining allegations, Chevron
17 lacks sufficient knowledge or information to form a belief about the truth of the allegations in this
18 paragraph and basing its response on this ground, denies each and every remaining allegation.

19 37. In response to paragraph 36 of the Complaint, Chevron lacks sufficient knowledge
20 or information to form a belief about the truth of the allegations in this paragraph and basing its
21 response on this ground, denies each and every allegation.

22 38. In response to paragraph 37 of the Complaint, Chevron lacks sufficient knowledge
23 or information to form a belief about the truth of the allegations in this paragraph and basing its
24 response on this ground, denies each and every allegation.

25 39. In response to paragraph 38 of the Complaint, Chevron lacks sufficient knowledge
26 or information to form a belief about the truth of the allegations in this paragraph and basing its
27 response on this ground, denies each and every allegation. Moreover, the documents referenced by

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1 Plaintiff in this paragraph speak for themselves and, thus, Plaintiff's restatement of the terms or
2 content of said documents is immaterial and, therefore, the allegations require no response.

3 40. In response to paragraph 39 of the Complaint, on information or belief Chevron
4 denies that Ms. Thornton was subjected to any discriminatory employment practices. As to the
5 remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about
6 the truth of the allegations in this paragraph and basing its response on this ground, denies each and
7 every remaining allegation.

8 41. In response to paragraph 40 of the Complaint, Chevron lacks sufficient knowledge
9 or information to form a belief about the truth of the allegations in this paragraph and basing its
10 response on this ground, denies each and every allegation. Moreover, the document referenced by
11 Plaintiff in this paragraph speaks for itself and, thus, Plaintiff's restatement of the terms or content
12 of said document is immaterial and, therefore, the allegations require no response.

13 42. In response to paragraph 41 of the Complaint, on information or belief Chevron
14 denies that Ms. Thornton was subjected to any discriminatory employment practices or that she
15 was placed on a Performance Improvement Plan for any unlawful reason. On information or belief
16 Chevron denies that Plaintiff was wrongfully terminated. As to the remaining allegations, Chevron
17 lacks sufficient knowledge or information to form a belief about the truth of the allegations in this
18 paragraph and basing its response on this ground, denies each and every remaining allegation.

19 43. In response to paragraph 42 of the Complaint, on information or belief Chevron
20 denies that Plaintiff was subjected to any discrimination or hostile work environment. As to the
21 remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about
22 the truth of the allegations in this paragraph and basing its response on this ground, denies each and
23 every remaining allegation.

24 44. In response to paragraph 43 of the Complaint, Chevron lacks sufficient knowledge
25 or information to form a belief about the truth of the allegations in this paragraph and basing its
26 response on this ground, denies each and every allegation.

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45. In response to paragraph 44 of the Complaint, on information or belief Chevron denies that Plaintiff, Ms. Thornton or Ms. Hernandez were subjected to any discriminatory or retaliatory employment practices. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies each and every remaining allegation.

46. In response to paragraph 45 of the Complaint, on information or belief Chevron denies that any actions were taken against Plaintiff because he allegedly complained about supposed discriminatory employment practices and Chevron further denies that Plaintiff was ever subjected to any discriminatory practices. As to the remaining allegation, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegation in this paragraph and basing its response on this ground, denies the allegation.

47. In response to paragraph 46 of the Complaint, on information or belief Chevron denies that any actions were taken against Plaintiff because he allegedly complained about supposed discriminatory employment practices and Chevron further denies that Plaintiff was ever subjected to any discriminatory practices. As to the remaining allegation, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegation in this paragraph and basing its response on this ground, denies the remaining allegation.

48. In response to paragraph 47 of the Complaint, on information or belief Chevron denies that Plaintiff was subjected to any discriminatory or retaliatory employment practices. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies the remaining allegations.

49. In response to paragraph 48 of the Complaint, on information or belief Chevron denies that Plaintiff was subjected to any discriminatory or retaliatory employment practices. As to the remaining allegation, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegation in this paragraph and basing its response on this ground, denies the remaining allegation.

1 50. In response to paragraph 49 of the Complaint, on information or belief Chevron
2 denies that Plaintiff was subjected to any harassment, retaliation, discrimination, a hostile work
3 environment or emotional distress or that any action was taken against him for his opposing any
4 supposed discriminatory employment practices. As to the remaining allegations, Chevron lacks
5 sufficient knowledge or information to form a belief about the truth of the allegations in this
6 paragraph and basing its response on this ground, denies each and every remaining allegation.

7 51. In response to paragraph 50 of the Complaint, on information or belief Chevron
8 denies that Plaintiff was subjected to any harassment, retaliation, discrimination, a hostile work
9 environment or emotional distress or that any action was taken against him for his opposing any
10 supposed discriminatory or retaliatory employment practices. As to the remaining allegations,
11 Chevron lacks sufficient knowledge or information to form a belief about the truth of the
12 allegations in this paragraph and basing its response on this ground, denies each and every
13 remaining allegation.

14 52. In response to paragraph 51 of the Complaint, on information or belief Chevron
15 denies that Plaintiff was subjected to discriminatory or retaliatory employment practices. As to the
16 remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about
17 the truth of the allegations in this paragraph and basing its response on this ground, denies each and
18 every remaining allegation.

19 53. In response to paragraph 52 of the Complaint, Chevron lacks sufficient knowledge
20 or information to form a belief about the truth of the allegations in this paragraph and basing its
21 response on this ground, denies each and every allegation.

22 54. In response to paragraph 53 of the Complaint, on information or belief Chevron
23 denies that Plaintiff was subjected to discriminatory or retaliatory employment practices. As to the
24 remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about
25 the truth of the allegations in this paragraph and basing its response on this ground, denies each and
26 every remaining allegation.

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55. In response to paragraph 54 of the Complaint, on information or belief Chevron denies that Plaintiff was subjected to discriminatory or retaliatory employment practices. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies each and every remaining allegation.

56. In response to paragraph 55 of the Complaint, on information or belief Chevron denies that Plaintiff was subjected to any harassment, discrimination, hostile work environment or retaliation. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies each and every remaining allegation.

57. In response to paragraph 56 of the Complaint, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies each and every allegation.

58. In response to paragraph 57 of the Complaint, on information or belief Chevron denies that Plaintiff was subjected to any retaliation or discriminatory or retaliatory employment practices. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies each and every remaining allegation.

59. In response to paragraph 58 of the Complaint, on information or belief Chevron denies that Plaintiff was subjected to any unfair treatment. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of the allegations in this paragraph and basing its response on this ground, denies each and every remaining allegation.

60. In response to paragraph 59 of the Complaint, Chevron denies the allegations on information or belief.

61. In response to paragraph 60 of the Complaint, Chevron denies the allegations on information or belief.

1 62. In response to paragraph 61 of the Complaint, on information or belief Chevron
2 denies that Plaintiff was subjected to any hostile work environment, discrimination, harassment, or
3 emotional distress. As to the remaining allegations, Chevron lacks sufficient knowledge or
4 information to form a belief about the truth of the allegations in this paragraph and basing its
5 response on this ground, denies each and every remaining allegation.

6 63. In response to paragraph 62 of the Complaint, Chevron lacks sufficient knowledge
7 or information to form a belief about the truth of the allegations in this paragraph and basing its
8 response on this ground, denies each and every remaining allegation.

9 64. In response to paragraph 63 of the Complaint, on information or belief Chevron
10 denies that Plaintiff was subjected to any hostile work environment, harassment, or retaliation. As
11 to the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief
12 about the truth of the allegations in this paragraph and basing its response on this ground, denies
13 each and every remaining allegation.

14 65. In response to paragraph 64 of the Complaint, on information or belief Chevron
15 denies that Plaintiff was wrongfully terminated or was subjected to any discriminatory or
16 retaliatory employment practices. As to the remaining allegations, Chevron lacks sufficient
17 knowledge or information to form a belief about the truth of the allegations in this paragraph and
18 basing its response on this ground, denies each and every remaining allegation.

19 66. In response to paragraph 65 of the Complaint, Chevron denies the allegations on
20 information or belief.

21 67. In response to paragraph 66 of the Complaint, on information or belief Chevron
22 denies that Plaintiff was subjected to any harassment or retaliation and denies that Plaintiff was
23 wrongfully terminated. As to the remaining allegations, Chevron lacks sufficient knowledge or
24 information to form a belief about the truth of the allegations in this paragraph and basing its
25 response on this ground, denies each and every remaining allegation.

26 68. In response to paragraph 67 of the Complaint, on information or belief Chevron
27 denies that Plaintiff was subjected to any discrimination, hostile work environment, harassment,
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1 retaliation, emotional distress or conduct constituting a violation of the ADA, state, local or federal
2 laws. As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a
3 belief about the truth of the allegations in this paragraph and basing its response on this ground,
4 denies each and every remaining allegation. Moreover, the document(s) referenced by Plaintiff in
5 this paragraph speak for themselves and, thus, Plaintiff's restatement of the terms or content of said
6 documents is immaterial and, therefore, the allegations require no response.

7 69. In response to paragraph 68 of the Complaint, Chevron denies the allegations on
8 information or belief.

9 70. In response to paragraph 69 of the Complaint, Chevron denies the allegations on
10 information or belief.

11 71. In response to paragraph 70 of the Complaint, Chevron denies the allegations on
12 information or belief.

13 72. In response to paragraph 71 of the Complaint, on information or belief Chevron
14 denies that Mr. Thornton was subjected to any harassment, retaliation, discrimination or emotional
15 distress. As to the remaining allegations, Chevron lacks sufficient knowledge or information to
16 form a belief about the truth of the allegations in this paragraph and basing its response on this
17 ground, denies each and every remaining allegation.

18 73. In response to paragraph 72 of the Complaint, Chevron denies the allegations on
19 information or belief.

20 74. In response to paragraph 73 of the Complaint, Chevron denies the allegations on
21 information or belief.

22 75. In response to paragraph 74 of the Complaint, Chevron denies the allegations on
23 information or belief.

24 76. In response to paragraph 75 of the Complaint, on information or belief Chevron
25 denies that Plaintiff was subjected to any harassment, unfair treatment, hostile work environment
26 retaliation or discrimination. As to the remaining allegations, Chevron lacks sufficient knowledge
27 or information to form a belief about the truth of the allegations in this paragraph and basing its

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1 response on this ground, denies each and every remaining allegation.

2 77. In response to paragraph 76 of the Complaint, Chevron denies the allegations on
3 information or belief. Moreover, the document referenced by Plaintiff in this paragraph speaks for
4 itself and, thus, Plaintiff's restatement of the terms or content of said document is immaterial and,
5 therefore, the allegation requires no response.

6 78. In response to paragraph 77 of the Complaint, Chevron denies the allegations on
7 information or belief.

8 79. In response to paragraph 78 of the Complaint, on information or belief Chevron
9 denies that Plaintiff was subjected to any discrimination or retaliation. As to the remaining
10 allegation, Chevron lacks sufficient knowledge or information to form a belief about the truth of
11 the allegation and basing its response on this ground, denies that remaining allegation.

12 80. In response to paragraph 79 of the Complaint, on information or belief Chevron
13 denies that Plaintiff was subjected to any discriminatory or retaliatory employment practices. As to
14 the remaining allegations, Chevron lacks sufficient knowledge or information to form a belief
15 about the truth of the allegations in this paragraph and basing its response on this ground, denies
16 each and every remaining allegation.

17 81. In response to paragraph 80 of the Complaint, on information or belief Chevron
18 denies that Plaintiff was subjected to any retaliation. As to the remaining allegation, Chevron lacks
19 sufficient knowledge or information to form a belief about the truth of the allegation and basing its
20 response on this ground, denies that remaining allegation.

21 82. In response to paragraph 81 of the Complaint, on information or belief Chevron
22 denies that Plaintiff was subjected to any retaliation. As to the remaining allegations, Chevron
23 lacks sufficient knowledge or information to form a belief about the truth of the allegations in this
24 paragraph and basing its response on this ground, denies each and every remaining allegation.
25 Moreover, the document referenced by Plaintiff in this paragraph speaks for itself and, thus,
26 Plaintiff's restatement of the terms or content of said document is immaterial and, therefore, the
27 allegations require no response.

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1 83. In response to paragraph 82 of the Complaint, on information or belief Chevron
2 denies that Plaintiff was subjected to any retaliation, harassment, discrimination, conduct
3 constituting a violation of the ADA, discriminatory or retaliatory employment practices, or
4 emotional distress. As to the remaining allegations, Chevron lacks sufficient knowledge or
5 information to form a belief about the truth of the allegations in this paragraph and basing its
6 response on this ground, denies each and every remaining allegation.

7 84. In response to paragraph 83 of the Complaint, on information or belief Chevron
8 denies that Plaintiff was subjected to any retaliation, harassment, discrimination, conduct
9 constituting a violation of the ADA, false accusations or statements. As to the remaining
10 allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of
11 the allegations in this paragraph and basing its response on this ground, denies each and every
12 remaining allegation.

13 85. In response to paragraph 84 of the Complaint, on information or belief Chevron
14 denies that Plaintiff was subjected to any retaliation, discrimination, conduct constituting a
15 violation of the ADA, false accusations and also denies that Plaintiff was wrongfully terminated.
16 As to the remaining allegations, Chevron lacks sufficient knowledge or information to form a
17 belief about the truth of the allegations in this paragraph and basing its response on this ground,
18 denies each and every remaining allegation.

19 86. In response to paragraph 85 of the Complaint, on information or belief Chevron
20 denies that Plaintiff was subjected to any discrimination, retaliation, conduct constituting a
21 violation of the ADA, discriminatory or retaliatory employment practices. As to the remaining
22 allegations, Chevron lacks sufficient knowledge or information to form a belief about the truth of
23 the allegations in this paragraph and basing its response on this ground, denies each and every
24 remaining allegation.

25 87. In response to paragraph 86 of the Complaint, Chevron denies the allegations on
26 information or belief.

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1 88. In response to paragraph 87 of the Complaint, Chevron denies the allegations on
2 information or belief.

3 89. In response to paragraph 88 of the Complaint, on information or belief Chevron
4 denies that Plaintiff was subjected to any discrimination or retaliation and also denies that Plaintiff
5 was wrongfully terminated. As to the remaining allegations, Chevron lacks sufficient knowledge or
6 information to form a belief about the truth of the allegations in this paragraph and basing its
7 response on this ground, denies each and every remaining allegation.

8 90. In response to paragraph 89 of the Complaint, Chevron denies the allegations on
9 information or belief.

10 91. In response to paragraph 90 of the Complaint, Chevron lacks sufficient knowledge
11 or information to form a belief about the truth of the allegations in this paragraph and basing its
12 response on this ground, denies each and every allegation.

13 92. In response to paragraph 91 of the Complaint, Chevron denies the allegations on
14 information or belief.

15 93. In response to paragraph 92 of the Complaint, Chevron lacks sufficient knowledge
16 or information to form a belief about the truth of the allegations in this paragraph and basing its
17 response on this ground, denies each and every allegation.

18 94. In response to paragraph 93 of the Complaint, Chevron lacks sufficient knowledge
19 or information to form a belief about the truth of the allegations in this paragraph and basing its
20 response on this ground, denies each and every allegation.

21 95. In response to paragraph 94 of the Complaint, Chevron denies the allegations on
22 information or belief.

23 96. In response to paragraph 95 of the Complaint, Chevron alleges that the procedural
24 statement is immaterial, and as such, requires no response. In addition, each of the allegations in
25 this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008,
26 and therefore, no response is required.

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1 97. In response to paragraph 96 of the Complaint, each of the allegations in this
2 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
3 therefore, no response is required.

4 98. In response to paragraph 97 of the Complaint, each of the allegations in this
5 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
6 therefore, no response is required.

7 99. In response to paragraph 98 of the Complaint, each of the allegations in this
8 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
9 therefore, no response is required.

10 100. In response to paragraph 99 of the Complaint, each of the allegations in this
11 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
12 therefore, no response is required.

13 101. In response to paragraph 100 of the Complaint, each of the allegations in this
14 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
15 therefore, no response is required.

16 102. In response to paragraph 101 of the Complaint, each of the allegations in this
17 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
18 therefore, no response is required.

19 103. In response to paragraph 102 of the Complaint, Chevron alleges that the procedural
20 statement is immaterial, and as such, requires no response. In addition, each of the allegations in
21 this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008,
22 and therefore, no response is required.

23 104. In response to paragraph 103 of the Complaint, each of the allegations in this
24 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
25 therefore, no response is required.

26 105. In response to paragraph 104 of the Complaint, each of the allegations in this
27 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and

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1 therefore, no response is required.

2 106. In response to paragraph 105 of the Complaint, each of the allegations in this
3 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
4 therefore, no response is required.

5 107. In response to paragraph 106 of the Complaint, each of the allegations in this
6 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
7 therefore, no response is required.

8 108. In response to paragraph 107 of the Complaint, each of the allegations in this
9 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
10 therefore, no response is required.

11 109. In response to paragraph 108 of the Complaint, each of the allegations in this
12 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
13 therefore, no response is required.

14 110. In response to paragraph 109 of the Complaint, Chevron alleges that the procedural
15 statement is immaterial, and as such, requires no response. In addition, each of the allegations in
16 this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008,
17 and therefore, no response is required.

18 111. In response to paragraph 110 of the Complaint, each of the allegations in this
19 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
20 therefore, no response is required.

21 112. In response to paragraph 111 of the Complaint, each of the allegations in this
22 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
23 therefore, no response is required.

24 113. In response to paragraph 112 of the Complaint, each of the allegations in this
25 paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and
26 therefore, no response is required.

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28 FBE&M

LAKE MERRITT PLAZA
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EIGHTEENTH FLOOR
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DEFENDANTS CHEVRON CORPORATION'S AND
CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY'S
ANSWER TO PLAINTIFF'S COMPLAINT;
DEMAND FOR JURY TRIAL
Case No. C 07-05756 WHA

114. In response to paragraph 113 of the Complaint, Chevron alleges that the procedural statement is immaterial, and as such, requires no response. In addition, each of the allegations in this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and therefore, no response is required.

115. In response to paragraph 114 of the Complaint, each of the allegations in this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and therefore, no response is required.

116. In response to paragraph 115 of the Complaint, each of the allegations in this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and therefore, no response is required.

117. In response to paragraph 116 of the Complaint, each of the allegations in this paragraph is irrelevant as Plaintiff dismissed all of his section 1983 claims on April 8, 2008, and therefore, no response is required.

118. In response to paragraph 117 of the Complaint, Chevron alleges that the procedural statement is immaterial, and as such, requires no response. Moreover, as to the "Individual Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on April 1, 2008.

119. In response to paragraph 118 of the Complaint, Chevron denies the allegations on information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on April 1, 2008.

120. In response to paragraph 119 of the Complaint, Chevron denies the allegations on information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on April 1, 2008.

121. In response to paragraph 120 of the Complaint, Chevron denies the allegations on information or belief and denies that Plaintiff has sustained any injury or is entitled to any

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1 damages, remedy or relief. Moreover, as to the "Individual Defendant," these allegations are
2 immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this
3 action on April 1, 2008.

4 122. In response to paragraph 121 of the Complaint, Chevron alleges that the procedural
5 statement is immaterial, and as such, requires no response. Moreover, as to the "Individual
6 Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily
7 dismissed all of those Defendants this action on April 1, 2008.

8 123. In response to paragraph 122 of the Complaint, Chevron denies the allegations on
9 information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial
10 and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on
11 April 1, 2008.

12 124. In response to paragraph 123 of the Complaint, Chevron denies the allegations on
13 information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial
14 and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on
15 April 1, 2008.

16 125. In response to paragraph 124 of the Complaint, Chevron denies the allegations on
17 information or belief and denies that Plaintiff has sustained any injury or is entitled to any
18 damages, remedy or relief. Moreover, as to the "Individual Defendant," these allegations are
19 immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this
20 action on April 1, 2008.

21 126. In response to paragraph 125 of the Complaint, Chevron alleges that the procedural
22 statement is immaterial, and as such, requires no response. Moreover, as to the "Individual
23 Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily
24 dismissed all of those Defendants this action on April 1, 2008.

25 127. In response to paragraph 126 of the Complaint, Chevron denies the allegations on
26 information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial
27 and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on
28

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1 April 1, 2008.

2 128. In response to paragraph 127 of the Complaint, Chevron denies the allegations on
3 information or belief and denies that Plaintiff has sustained any injury or is entitled to any
4 damages, remedy or relief. Moreover, as to the "Individual Defendant," these allegations are
5 immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this
6 action on April 1, 2008.

7 129. In response to paragraph 128 of the Complaint, Chevron alleges that the procedural
8 statement is immaterial, and as such, requires no response. Moreover, as to the "Individual
9 Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily
10 dismissed all of those Defendants this action on April 1, 2008.

11 130. In response to paragraph 129 of the Complaint, Chevron denies the allegations on
12 information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial
13 and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on
14 April 1, 2008.

15 131. In response to paragraph 130 of the Complaint, Chevron denies the allegations on
16 information or belief. Moreover, as to the "Individual Defendant," these allegations are immaterial
17 and require no response as Plaintiff voluntarily dismissed all of those Defendants this action on
18 April 1, 2008.

19 132. In response to paragraph 131 of the Complaint, Chevron denies the allegations on
20 information or belief and denies that Plaintiff has sustained any injury or is entitled to any
21 damages, remedy or relief. Moreover, as to the "Individual Defendant," these allegations are
22 immaterial and require no response as Plaintiff voluntarily dismissed all of those Defendants this
23 action on April 1, 2008.

24 133. In response to paragraph 132 of the Complaint, Chevron alleges that the procedural
25 statement is immaterial, and as such, requires no response. Moreover, as to the "Individual
26 Defendant," these allegations are immaterial and require no response as Plaintiff voluntarily
27 dismissed all of those Defendants this action on April 1, 2008.

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